

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

FEI GUAN,)	
)	
Plaintiff,)	
)	Case No. 1:17-cv-00332 (JCC/IDD)
v.)	
)	
BING RAN; ALICE GUAN; ADVANCED)	
SYSTEMS TECHNOLOGY AND)	
MANAGEMENT, INC.; AND QI TECH,)	
LLC,)	
)	
Defendants.)	

**DEFENDANT ADVANCED SYSTEMS TECHNOLOGY AND MANAGEMENT, INC.’S
MOTION TO DISMISS THE COMPLAINT FOR FAILURE TO STATE A CLAIM**

Defendant Advanced Systems Technology and Management, Inc. (“AdSTM”) respectfully moves this Court to dismiss the Complaint against it for failure to state a claim upon which relief can be granted under Fed. R. Civ. P. 12(b)(6). The grounds for this motion are set forth more fully in the accompanying memorandum of law in support of this motion. For the reasons set forth in AdSTM’s memorandum, AdSTM respectfully requests that the Court dismiss the Complaint against AdSTM in its entirety.

Dated: April 26, 2017

Respectfully submitted,

/s/ James B. Kinsel

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CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2017, I electronically filed a true and correct copy of the foregoing paper with the Clerk of the Court using the CM/ECF system, which will send electronic notification of such filing (NEF) to all registered users of the Court's CM/ECF system who have filed notices of appearance in this matter.

/s/ James B. Kinsel